

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes

NOTICE OF APPEAL

Pursuant to 28 U.S.C. § 158(a) and (d) and Rule 8001 of the Federal Rules of Bankruptcy Procedure, the Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually, and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”) and Shirley V. Lightsey, individually, and as President of the DRCEA (collectively “Retiree Association Parties”), through their counsel, Lippitt O’Keefe, PLLC and Silverman & Morris, P.L.L.C., file this notice of appeal of the Opinion Regarding Eligibility (dkt. 1945) and the Order for Relief Under Chapter 9 of the Bankruptcy Code (dkt. 1946) entered on December 5, 2013 by the United States Bankruptcy Court for the Eastern District of Michigan (together, the “Eligibility Order”). Attached as Exhibit 1 is a Bankruptcy Matter Civil Case Cover Sheet.

The names of all parties to the Eligibility Order, and the names, addresses, and telephone numbers of their respective attorneys are set forth below. In addition, approximately 92 individuals were invited to address the Bankruptcy Court at the hearing on September 19, 2013 regarding their objections to eligibility (the “Individual Objectors”). The Individual Objectors are listed on Exhibit 2.

**The Police and Fire Retirement System of the City of Detroit
The General Retirement System of the City of Detroit**

Represented by:

CLARK HILL PLC

Robert D. Gordon (P48627)

Shannon L. Deeby (P60242)

Jennifer K. Green (P69019)

Evan J. Feldman (P73437)

151 South Old Woodward Avenue, Suite 200

Birmingham, Michigan 48009

Phone: (248) 988-5882 Fax: (248) 988-2502

rgordon@clarkhill.com

ARNOLD & PORTER LLP

Lisa Hill Fenning (admitted *pro hac vice*)

777 South Figueroa Street, 44th Floor

Los Angeles, California 90017

Phone: (213) 243-4000 Fax: (213) 243-4199

lisa.fenning@aporter.com

The City of Detroit, Michigan

Represented by:

JONES DAY

Bruce Bennett (CA 105430)

555 South Flowers Street, Fiftieth Floor

Los Angeles, California 90071

Phone: (213) 243-2382 Fax: (213) 243-2539

bbennett@jonesday.com

JONES DAY

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

North Point, 901 Lakeside Avenue

Cleveland, Ohio 44114

Phone: (216) 586-3939 Fax: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Phone: (313) 963-6420 Fax: (313) 496-7500

green@millercanfield.com

laplante@millercanfield.com

The Detroit Fire Fighters Association

The Detroit Police Officers Association

The Detroit Police Lieutenants & Sergeants Association

The Detroit Police Command Officers Association

Represented by:

ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C.

Earle I. Erman (P24296)

Craig E. Zucker (P39907)

Barbara A. Patek (P34666)

400 Galleria Officentre, Suite 444

Southfield, MI 48034

Phone: (249) 827-4100 Fax: (248) 827-4106

bpatek@ermanteicher.com

International Union of Operating Engineers, Local 324

Represented by:

SACHS WALDMAN, P.C.

Andrew Nickelhoff (P37990)

Mami Kato (P74237)

2211 East Jefferson Avenue, Suite 200

Detroit, MI 48207

Phone: (313) 496-9429 Fax: (313) 965-4602

anickelhoff@sachswaldman.com

mkato@sachswaldman.com

Service Employees International Union, Local 517M

Represented by:

SACHS WALDMAN, P.C.
Andrew Nickelhoff (P37990)
Mami Kato (P74237)
2211 East Jefferson Avenue, Suite 200
Detroit, MI 48207
Phone: (313) 496-9429 Fax: (313) 965-4602
anickelhoff@sachswaldman.com
mkato@sachswaldman.com

David Sole

Represented by:

JEROME D. GOLDBERG, PLLC
Jerome D. Goldberg (P61678)
2921 East Jefferson, Suite 205
Detroit, MI 48207
Phone: (313) 393-6001 Fax: (313) 393-6007
apclawyer@sbcglobal.net

The Retired Detroit Police & Fire Fighters Association

Donald Taylor, individually and as President of the Retired Detroit Police & Fire Fighters Association

The Detroit Retired City Employees Association

Shirley V. Lightsey, individually and as President of the Detroit Retired City Employees Association

Represented by:

LIPPITT O'KEEFE, PLLC
Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
370 East Maple Road, 3rd Floor
Birmingham, MI 48009
Phone: (248) 646-8292 Fax: (248) 646-8375
rplecha@lippittokeefe.com

SILVERMAN & MORRIS, P.L.L.C.
Thomas R. Morris (P39141)
30500 Northwestern Highway, Suite 200
Farmington Hills, MI 48334
Phone: (248) 539-1330 Fax: (248) 539-1355
morris@silvermanmorris.com

Robbie Flowers
Michael Wells
Janet Whitson
Mary Washington
Bruce Goldman

Represented by:
William A. Wertheimer (P26275)
30515 Timberbrook Lane
Bingham Farms, MI 48025
Phone: (248) 644-9200
billwertheimer@gmail.com

Michigan Council 25 of The American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (AFSCME)

Represented by:
LOWENSTEIN SANDLER LLP
Sharon L. Levine, Esq.
Wojciech F. Jung, Esq.
Philip J. Gross, Esq.
65 Livingston Avenue
Roseland, NJ 07068
Phone: (973) 597-2500 Fax: (973) 597-6247
slevine@lowenstein.com
wjung@lowenstein.com
pgross@lowenstein.com

THE SANDERS LAW FIRM PC
Herbert A. Sanders, Esq.
615 Griswold St., Suite 913
Detroit, MI 48226
Phone: (313) 962-0099 Fax: (313) 962-0044
jsanders@miafscme.org

MILLER COHEN, P.L.C.
Richard G. Mack, Jr., Esq.
600 West Lafayette Boulevard, 4th Floor
Detroit, MI 48226
Phone: (313) 964-4454 Fax: (313) 964-4490
richardmack@millercohen.com

**International Union, United Automobile, Aerospace and Agricultural Implement
Workers of America**

Represented by:
COHEN, WEISS AND SIMON LLP
Babette A. Ceccotti
Keith E. Secular
Thomas N. Ciantra
Joshua J. Ellison
330 West 42nd Street
New York, NY 10036
Phone: (212) 563-4100 Fax: (212) 695-5436
bceccotti@cwsny.com

Niraj R. Ganatra (P63150)
Michael Nicholson (P33421)
8000 East Jefferson Avenue
Detroit, MI 48214
Phone: (313) 926-5216 Fax: (313) 926-5240
nganatra@uaw.net
mnicholson@uaw.net

Center for Community Justice and Advocacy

Represented by:
VANESSA G. FLUKER, ESQ. PLLC
Vanessa G. Fluker (P64870)
2921 East Jefferson, Suite 200
Detroit, MI 48207
Phone: (313) 393-6005 Fax: (313) 393-6007
vgflawyer@sbcglobal.net

Retired Detroit Police Members Association

Represented by:

STROBL & SHARP, P.C.

Lynn M. Brimer (P43291)

Meredith E. Taunt (P69698)

Mallory A. Field (P75289)

300 East Long Lake Road, Suite 200

Bloomfield Hills, MI 48304

Phone: (248) 540-2300 Fax: (248) 645-2690

lbrimer@strobpc.com

mtaunt@strobpc.com

mfield@strobpc.com

Krystal Crittendon

19737 Chesterfield

Detroit, MI 48221

Phone: (313) 237-3031 Fax: (313) 237-3025

critk@detroitmi.gov

The Retiree Committee of the City of Detroit

Represented by:

DENTONS US LLP

Carole Neville

1221 Avenue of the Americas

New York, New York 10020

Phone: (212) 768-6700 Fax: (212) 768-6800

carole.neville@dentons.com

DENTONS US LLP

Sam J. Alberts

1301 K Street, NW, Ste.600, East Tower

Washington, DC 20005-3364

Phone: (202) 408-6400 Fax: (202) 408-6399

sam.alberts@dentons.com

SALANS FMC SNR DENTON EUROPE LLP

Claude D. Montgomery (P29212)
Rockefeller Center, 620 Fifth Avenue
New York, New York 10020
Phone: (212) 632-8390
claude.montgomery@dentons.com

BROOKS WILKINS SHARKEY & TURCO PLLC

Matthew E. Wilkins (P56697)
Paula A. Hall (P61101)
401 South Old Woodward, Suite 400
Birmingham, Michigan 48009
Phone: (248) 971-1711 Fax: (248) 971-1801
wilkins@bwst-law.com
hall@bwst-law.com

Dated: December 9, 2013

Respectfully submitted,

SILVERMAN & MORRIS, P.L.L.C.

/s/ Thomas R. Morris

Thomas R. Morris (P39141)
30500 Northwestern Highway, Suite 200
Farmington Hills, Michigan 48334
Telephone: (248) 539-1330
Facsimile: (248) 539-1355
morris@silvermanmorris.com

LIPPITT O'KEEFE, PLLC

Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
370 East Maple Road, 3rd Floor
Birmingham, Michigan 48009
Telephone: (248) 646-8292
Facsimile: (248) 646-8375
bokeefe@lippittokeefe.com
rplecha@lippittokeefe.com

*Counsel to the Police and Fire Retirement System of
the City of Detroit and the General Retirement
System of the City of Detroit*

EXHIBIT 1

Bankruptcy Matter Civil Case Cover Sheet

In re:

CITY OF DETROIT, MICHIGAN

Case No.: 13-53846-swr

Debtor.

DETROIT RETIRED CITY EMPLOYEES
ASSOCIATION, SHIRLEY V. LIGHTSEY,
individually, and as President of the DRCEA,
RETIRED DETROIT POLICE & FIRE
FIGHTERS ASSOCIATION, and
DONALD TAYLOR, individually, and as
President of the RDPFFA,

Appellant,

v.

CITY OF DETROIT, MICHIGAN,

Appellee.

CAUSE OF ACTION/NATURE OF SUIT: (This matter is referred to the district court for the following reasons)

<u> X </u>	[422] 28 U.S.C. 158	Bankruptcy Appeal
<u> </u>	[422] 28 U.S.C. 158	Motion for Leave to Appeal
<u> </u>	[423] 28 U.S.C. 157(d)	Motion for Withdrawal of Reference
<u> </u>	[423] 28 U.S.C. 157(c) (1)	Proposed Findings of Fact and Conclusions of Law
<u> </u>	[423] 28 U.S.C. 158 (c) (a)	Order of Contempt

Date: December 11, 2013

Name: /s/Ryan C. Plecha

Name and Address of Interested Parties: See lists attached to Notice of Appeal

EXHIBIT 2

List of Individual Objectors

Approximately 92 Individual Objectors were invited to address the Bankruptcy Court at the hearing on September 19, 2013 regarding their objections to eligibility. Their names and addresses are below.

Michael Abbott
19391 Heldon Drive
Detroit, MI

Charles D. Brown
1365 Joliet Place
Detroit, MI 48207

The Association of Professional and
Technical Employee (APTE)
Dempsey Addison and
Cecily McClellan
2727 Second Ave., Ste. 152
Detroit, MI 48201

Lorene Brown
2227 Hughes Terrace
Detroit, MI 48208

Paulette Brown
19260 Lancashire
Detroit, MI 48223

Linda Bain
1071 Baldwin
Detroit, MI 48214

Rakiba Brown
612 Clairmount St.
Detroit, MI 48202

Randy Beard
16840 Strathmoor St.
Detroit, MI 48235

Regina Bryant
2996 Bewick St.
Detroit, MI 48214

Russell Bellant
19619 Helen
Detroit, MI 48234

Mary Diane Bukowski
9000 E. Jefferson, #10-9
Detroit, MI 48214

Michael G. Benson
19395 Parkside
Detroit, MI 48221

David Bullock
701 W. Hancock
Detroit, MI 48201

Cynthia Blair
8865 Espes
Detroit, MI 49204

Claudette Campbell
1021 Winchester Ave.
Lincoln Park, MI 48146

Dwight Boyd
19337 Concord
Detroit, MI 48234

Johnnie R. Carr
11310 Mansfield
Detroit, MI

Elmarie Dixon
4629 Philip St.
Detroit, MI 48215

Sandra Carver
10110 S. Outer Dr.
Detroit, MI 48224

Mary Dugans
18034 Birchcrest
Detroit, MI 48221

Raleigh Chambers
14861 Ferguson St.
Detroit, MI 48227

Lewis Dukens
1362 Joliet Pl.
Detroit, MI 48207

Alma Cozart
18331 Shaftsbury
Detroit, MI 48219

David Dye
19313 Ardmore
Detroit, MI 48235

Leola Regina Crittendon
19737 Chesterfield Rd.
Detroit, MI 48221

Jacqueline Esters
18570 Glastonbury
Detroit, MI 48219

Angela Crockett
19680 Roslyn Rd.
Detroit, MI 48221

Arthur Evans
11391 Nottingham Rd.
Detroit, MI 48224

Lucinda J. Darrah
482 Peterboro
Detroit, MI 48201

Jerry Ford
9750 W. Outer Drive
Detroit, MI 48223

Joyce Davis
15421 Strathmoor St.
Detroit, MI 48227

William D. Ford
18034 Birchcrest Dr.
Detroit, MI 48221

Sylvester Davis
[Address Not Available
on Rule 2002 Notice List]

Ulysses Freeman
14895 Faust
Detroit, MI 48223

William Davis
9203 Littlefield
Detroit, MI 48228

Olivia Gillon
18832 Arleen Court
Livonia, MI 48152

Donald Glass
411 Chalmers
Detroit, MI 48215

Sallie M. Jones
4413 W. Philadelphia
Detroit, MI 48204

Lavarre W. Greene
19667 Roslyn Rd.
Detroit, MI 48221

Aleta Atchinson-Jorgan
7412 Henry St.
Detroit, MI 48214

William Hickey
14910 Lamphere St.
Detroit, MI 48223

Zelma Kinchloe
439 Henry St.
Detroit, MI 48201

LaVern Holloway
16246 Linwood Street
Detroit, MI 48221

Timothy King
4102 Pasadena
Detroit, MI 48238

William J. Howard
17814 Charest
Detroit, MI 48212

Keetha R. Kittrell
22431 Tireman
Detroit, MI

Joanne Jackson
16244 Princeton
Detroit, MI 48221

Michael Joseph Karwoski
26015 Felicity Landing
Harrison Twp., MI 48045

Ailene Jeter
18559 Brinker
Detroit, MI 48234

Roosevelt Lee
11961 Indiana
Detroit, MI 48204

Sheilah Johnson
277 King Street
Detroit, MI 48202

Althea Long
9256 Braile
Detroit, MI 48228

Stephen Johnson
31354 Evergreen Road
Beverly Hills, MI 48025

Edward Lowe
18046 Sussex
Detroit, MI 48235

Joseph H. Jones
19485 Ashbury Park
Detroit, MI 48235

Lorna Lee Mason
1311 Wyoming
Detroit, MI 48238

Deborah Moore
4436 Lemay Road
Detroit, MI 48214

Deborah Pollard
20178 Pinehurst
Detroit, MI 48221

Larene Parrish
18220 Snowden
Detroit, MI 48255

Lou Ann Pelletier
2630 Lakeshore Road
Applegate, MI 48401

Michael K. Pelletier
1063 Lakeshore Road
Applegate, MI 48401

Heidi Peterson
Represented by:
Charles Bruce Idelsohn P36799
P.O. Box 856
Detroit, MI 48231
charlesidelsohnattorney@yahoo.com

Helen Powers
100 Winona
Highland Park, MI 48203

Alice Pruitt
18251 Freeland
Detroit, MI 48235

Samuel L. Riddle
1276 Navarre Pl.
Detroit, MI 48207

Kwabena Shabu
2445 Lamothe St.
Detroit, MI 48226

Michael D. Shane
16815 Patton
Detroit, MI 48219

Karl Shaw
19140 Ohio
Detroit, MI 48221

Frank Sloan, Jr.
18953 Pennington Dr.
Detroit, MI 48221

Gretchen R. Smith
3901 Grand River Ave., #913
Detroit, MI 48208

Horace E. Stallings
1492 Sheridan St.
Detroit, MI 48214

Thomas Stephens
4595 Hereford
Detroit, MI 48224

Dennis Taubitz
4190 Devonshire Rd.
Detroit, MI 48226

Charles Taylor
11472 Wayburn
Detroit, MI 48224

Marzelia Taylor
11975 Indiana
Detroit, MI 48204

The Chair of St. Peter
1300 Pennsylvania Ave., N.W.
Washington, DC 20004

Cheryl Smith Williams
3486 Baldwin
Detroit, MI 48214

Dolores A. Thomas
17320 Cherrylawn
Detroit, MI 48221

Charles Williams, II
6533 E. Jefferson, Apt. 118
Detroit, MI 48207

Shirley Tollivel
16610 Inverness
Detroit, MI 48221

Floreen Williams
16227 Birwood
Detroit, MI 48221

Tracey Tresvant
19600 Anvil
Detroit, MI 48205

Fraustin Williams
11975 Indiana
Detroit, MI 48204

Calvin Turner
16091 Edmore
Detroit, MI 48205

Leonard Wilson
100 Parsons St., Apt. 712
Detroit, MI 48201

Jean Vorkamp
11234 Craft
Detroit, MI 48224

Phebe Lee Woodberry
803 Glastone
Detroit, MI 48202

William Curtis Walton
4269 Glendale
Detroit, MI 48238

Anthony G. Wright, Jr.
649 Alger St.
Detroit, MI 48202

Jo Ann Watson
100 Riverfront Drive, #1508
Detroit, MI 48226

Judith West
[Address Not Available
on Rule 2002 Notice List]

Preston West
18460 Fairfield
Detroit, MI 48221

CERTIFICATE OF SERVICE

The undersigned certifies that on December 12, 2013, the foregoing document was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

LIPPITT O'KEEFE, PLLC

By: /s/ Ryan C. Plecha

Brian D. O'Keefe (P39603)

Ryan C. Plecha (P71957)

Attorneys for Retiree Association Parties

370 East Maple Road, 3rd Floor

Birmingham, Michigan 48009

Tel: (248) 646-8292; Fax: (248) 646-8375

bokeefe@lippittokeefe.com

rplecha@lippittokeefe.com

SILVERMAN & MORRIS, P.L.L.C.

Thomas R. Morris (P39141)

Karin F. Avery (P45364)

Co-counsel for Retiree Association Parties

30500 Northwestern Hwy., Suite 200

Farmington Hills, Michigan 48334

Tel: (248) 539-1330; Fax: (248) 539-1355

morris@silvermanmorris.com

avery@silvermanmorris.com

Dated: December 12, 2013